

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

GREGORY BOYER, as Administrator of the
Estate of Chrstine Boyer, and on his own behalf,

Plaintiff,

v.

Lead Case No. 20-CV-1123

**ADVANCED CORRECTIONAL
HEALTHCARE, INC., et al.,**

Defendants.

GREGORY BOYER, as Administrator of the
Estate of Chrstine Boyer, and on his own behalf,

Plaintiff,

v.

Case No. 22-CV-723

**USA MEDICAL & PSYCHOLOGICAL
STAFFING, et al.,**

Defendants.

DECLARATION OF DANIEL A. KAFKA

I, Daniel A. Kafka, declare as follows pursuant to 28 U.S.C § 1746:

1. That I am one of the attorneys of record for defendants Advanced Correctional Healthcare, Inc., Lisa Pisney, and Amber Fennigkoh (collectively the “ACH Defendants”).

2. I make this Declaration upon personal knowledge and in support of the ACH Defendants’ Brief in Opposition to Plaintiff’s Renewed Motion to Compel Dated 5 September, 2023.

3. Plaintiff’s counsel and ACH’s counsel held a Rule 37 conference on July 13, 2023, as requested in plaintiff’s Rule 37 letter dated June 26, 2023. Parties were unsuccessful in resolving

all plaintiffs' identified discovery disputes. As a supplement to that conversation, ACH Counsel emailed plaintiffs' counsel on August 15, 2023.

4. Attached hereto as Exhibit 1 is a true and correct copy of an email dated August 15, 2023, from Atty. Doug Knott to Atty. Steven Weil restating/supplementing ACH Defendants' position regarding Atty. Weil's June 26, 2023, Rule 37 letter.

5. Attached hereto as Exhibit 2 is a true and correct copy of Atty. Weil's August 16, 2023 response email to Atty. Knott demanding a conference within seven days.

I declare under penalty of perjury that the foregoing is true and correct.

Dated this 2nd day of October, 2023.

/s/ Daniel A. Kafka
Daniel A. Kafka, State Bar No. 1122144